

**Schlacter & Associates
Attorneys for Plaintiff
450 Seventh Avenue
New York, New York 10123
(212) 695-2000
By: Jed R. Schlacter (JRS-4874)**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

BHAVIKA APPARELS PVT. LTD.,

23 Civ. 6177 (JSR)

Plaintiff,

-against-

LOUISE PARIS, LTD.,

Defendant.

-----X

**NOTICE OF MOTION OF PLAINTIFF, BHAVIKA APPARELS PVT. LTD.,
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that upon the accompanying Declarations of Deepak Gupta and Jed R. Schlacter, dated January 22, 2024, and the Exhibits annexed thereto, the Rule 56.1 Statement, the accompanying Memorandum of Law, and all prior pleadings and proceedings had herein, the Plaintiff Bhavika Apparels Pvt. Ltd., by and through its attorneys, Schlacter & Associates, will and hereby does move this Court before the Honorable Jed S. Rakoff, of the United States District Court for the Southern District of New York, at the Courthouse located at 500 Pearl Street, New York, NY 10007, for the following relief:

1. Summary Judgment on behalf of Plaintiff, and against Defendant Louise Paris, Ltd., pursuant to Rule 56 of the F.R.C.P., on each cause of action in the Complaint, in the sum of \$208,582.20 plus interest at the rate of 9% per annum from June 1, 2022; and

2. Such other and further relief as this Court deems just and proper, including costs and disbursements, as well as relief pursuant to Rule 11 of the Federal Rules of Civil Procedure and 28 U.S.C. Section 1927.

The grounds upon which the requested relief are predicated are set forth in the accompanying Declarations and Memorandum of Law.

In accordance with the Case Management Order filed October 5, 2023, Defendant's opposition papers are to be filed by February 12, 2024, and Plaintiff's reply papers are to be filed by February 20, 2024.

Dated: New York, New York
January 22, 2024

Respectfully submitted,

SCHLACTER & ASSOCIATES
Attorneys for Plaintiff

By: Jed R. Schlacter
Jed R. Schlacter (JRS-4874)

450 Seventh Avenue, Suite 705
New York, NY 10123
212 695-2000
jed@schlacterassociates.com

TO: Jared H. Louzon, Esq.
Lazarus & Lazarus, P.C.
Attorneys for Defendant
240 Madison Avenue, 8th floor
New York, NY 10016
212 889-7400
jhlouzon@lazarusandlazarus.com